

1 Kirsten A. Milton
2 Nevada State Bar No. 14401
3 Daniel I. Aquino
4 Nevada State Bar No. 12682
5 **JACKSON LEWIS P.C.**
6 300 S. Fourth Street, Suite 900
7 Las Vegas, Nevada 89101
8 Tel: (702) 921-2460
9 Email: Kirsten.milton@jacksonlewis.com
10 Daniel.aquino@jacksonlewis.com

7 *Attorneys for Defendant*
8 *J.C.M. Industries, Inc. dba Advance Storage*
9 *Products*

10
11
12 **UNITED STATES DISTRICT COURT**
13
14 **DISTRICT OF NEVADA**

15 QUINTON DRUMMER, STEFFAN
16 WEBB, and DEMONTRAY
17 STALLWORTH, individually, and on
18 behalf of all others similarly situated,

19 Plaintiffs,
20 vs.

21 ALPHA TEAM CONSTRUCTION
22 CORPORATION, BG CONSTRUCTION
23 SERVICES, LLC, HECTOR BELTRAN,
24 and J.C.M. INDUSTRIES, INC., doing
25 business as ADVANCE STORAGE
26 PRODUCTS, jointly and severally,

27 Defendants.

28 Case No.: 2:18-cv-01251-RFB-NJK

29
30 **STIPULATION AND ORDER TO EXTEND**
31 **TIME TO FILE AMENDED JOINT**
32 **PROPOSED DISCOVERY PLAN AND**
33 **SCHEDULING ORDER**
34 **(First Request)**

35
36 Defendant J.C.M. Industries, Inc. doing business as Advance Storage Products (“JCM”),
37 by and through its counsel, Jackson Lewis P.C., Plaintiffs Quinton Drummer, Steffan Webb and
38 Demontray Stallworth (“Plaintiffs”), by and through their counsel, Wolf, Rifkin, Shapiro,
39 Schulman & Rabkin, LLP, and Defendant Hector Beltran, in proper person, hereby submit this
40 stipulation to extend to submit their joint proposed discovery plan and scheduling order.

41
42 Plaintiffs served their First Amended Collective and Class Action Complaint on JCM on
43 July 5, 2019, adding JCM as a Defendant to this action. The parties stipulated to extend JCM’s

1 deadline to answer or otherwise respond to Plaintiff's First Amended Collective and Class Action
2 Complaint to August 26, 2019. The parties believe that more meaningful discussions regarding
3 scope of discovery may be had after the filing of JCM's responsive pleading. The parties seek an
4 extension through and including September 9, 2019 to file their proposed Discovery Plan and
5 Scheduling Order. This extension will provide the parties with two weeks to confer regarding the
6 scope of discovery based on JCM's responsive pleading and any defenses asserted.

7 ////

8 ////

9 ////

10 ////

11 ////

12 ////

13 ////

14 ////

15

16

17

18

19

20

21

22

23

24

25

26

27

28

STIPULATION

NOW THEREFORE, the parties hereby agree and stipulate as follows:

The deadline for filing the parties' Amended Joint Proposed Discovery Plan and Scheduling order be continued to September 9, 2019. This stipulation and order is sought in good faith and not for the purpose of delay.

Dated this 14th day of August, 2019.

WOLF, RIFKIN, SHAPRIO, SCHULMAN
& RABKIN, LLP

JACKSON LEWIS P.C.

/s/ *Charles R. Ash, IV*

Don Springmeyer, Bar No. 1021
Bradley S. Schrager, Bar No. 10217
Daniel Bravo, Bar No. 13078
3556 E. Russell Road, Second Floor
Las Vegas, Nevada 89102

/s/ Daniel I. Aquino

Kirsten A. Milton, Bar No. 14401
Daniel I. Aquino, Bar No. 12682
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101
*Attorneys for Defendant J.C.M. Industries, Inc.
dba Advance Storage Products*

Charles R. Ash, IV, Pro Hac Vice
Sommers Schwartz, P.C.
One Towne Square, 17th Floor
Southfield, Michigan 48076
Attorneys for Plaintiffs

/s/ Hector Beltran

Hector Beltran
BG Construction Services, LLC
9775 Hightower Road
Roswell, GA 30075
Defendant, in proper person

IT IS SO ORDERED.

Dated this 15 day of August, 2019.

MAGISTRATE JUDGE